Yisel Dean, Independent Administratrix of the ) Estate of Steven Dean, deceased, and on behalf ) of all statutory beneficiaries,

Plaintiff,

VS.

Case No.: 05 CV 10155 PBS

Raytheon Company, a Delaware Corporation, )
Raytheon Aircraft Holdings, Inc., a Delaware )
Corporation, Raytheon Aircraft Company, a )
Kansas Corporation, Raytheon Credit )
Corporation, a Kansas Corporation, Colgan Air )
Inc., a Virginia Corporation d/b/a US Air )
Express,

Defendants.

## PLAINTIFF'S MOTION FOR WAIVER OF ELECTRONIC FILING

Plaintiff moves this Honorable Court for waiver of the electronic filing requirement in filing the attached copy of Plaintiff Yisel Dean's Motion and Suggestions to Exclude Matters outside the Pleadings or in the Alternative Protective Motion for Discovery for the Purpose of Responding to Defendant Colgan's Motion to Dismiss and Plaintiffs Response and Memorandum of Law and Fact in Opposition to Defendant Colgan's Motion to Dismiss.

In support thereof, Plaintiff states that Plaintiff's counsel has registered for CM/ECF with the U.S. District Court for the District of Massachusetts. However, Plaintiff's counsel has not yet received the login and password information that would allow Plaintiff to file these documents electronically. (See Exhibit "A"). Plaintiff further

states that it is necessary to serve the copy of Plaintiff Yisel Dean's Motion and Suggestions to Exclude Matters outside the Pleadings or in the Alternative Protective Motion for Discovery for the Purpose of Responding to Defendant Colgan's Motion to Dismiss and Plaintiffs Response and Memorandum of Law and Fact in Opposition to Defendant Colgan's Motion to Dismiss in a timely fashion in order to comply with Fed. R. Civ. Pro. Rule 4.

Date: July 18, 2005 Respectfully Submitted,

Robert J. McConnell, Esq. (BBO# 560625)

Motley Rice LLC 321 South Main Street P.O. Box 6067

Providence, RI 02903

401-457-7700

Attorney for Plaintiff

Mary thon

## **CERTIFICATION**

I hereby certify on the 18 day of July, 2005, I did cause to be served, via regular mail, postage prepaid, the within documents to all counsel of record.

Peter C. Knight Gary W. Harvey Tory A. Weigand MORRISON MAHONEY LLP 250 Summer Street Boston, MA 02210

Mark A. Dombroff Thomas B. Almy Andre M. Gregorian DOMBROFF & GILMORE, P.C. 1676 International Drive McLean, VA 22102